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Governor

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Lt. Governor

## NEW MEXICO ENVIRONMENT DEPARTMENT

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**Certified Mail – Return Receipt Requested**



BUTCH TONGATE  
Cabinet Secretary

J. C. BORREGO  
Deputy Secretary

March 15, 2018

Mr. Joseph Romero  
Cordova Mutual Domestic Water Consumers Association  
Post Office 40  
Cordova, New Mexico 87323

**Re: Cordova MDWCA, Minor, SIC 4952; NPDES Reconnaissance Inspection; Inspection Date:  
February 20, 2018**

Dear Mr. Romero:

The New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB) conducted a reconnaissance inspection (RI) of your facility on February 20, 2018 in response to a complaint alleging an ongoing sewage overflow. The complaint also indicated that raw sewage was entering a surface water, the Rio Quemado.

Enclosed please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and corrections made at the addresses below:

David Long, Enforcement Coordinator  
Environmental Protection Agency, Region 6  
NPDES Enforcement Branch (6EN-WM)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Sarah Holcomb, Program Manager  
New Mexico Environment Department  
Surface Water Quality Bureau (N2050)  
Point Source Regulation Section  
P.O. Box 5469  
Santa Fe, New Mexico 87502

David Long (Long.David@epa.gov) is USEPA Region 6's Acting NPDES Enforcement Coordinator at the above address. If you have any questions about this inspection report, please contact Sandra Gabaldón at 505-827-1041 or at Sandra.gabaldon@state.nm.us.

Sincerely,

Sarah Holcomb  
Program Manager  
Point Source Regulation Section  
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail  
David Long, USEPA (6EN-WM) by e-mail  
Amy Andrews, USEPA (6EN-WM) by e-mail  
David Esparza, USEPA (6EN-WM) by e-mail  
Brent Larsen and Tung Nguyen, USEPA (6WQ-PP) by e-mail  
Gladys Gooden-Jackson, USEPA (6EN-WC) by e-mail  
Robert Italiano, NMED District II by e-mail  
Eric Hall, NMED, UOCP by email

SH/sg



Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

## NPDES Compliance Inspection Report

### Section A: National Data System Coding

Transaction Code			NPDES										yr/mo/day					Inspec. Type		Inspector		Fac Type						
1	N	2	5	3	N	M	U	0	0	1	9	6	2	1	8	0	2	2	0	18	C	19	S	20	1			
C					O	R	D	O	V	A	M					D	W	C	A	M					I	N	O	r
Inspection Work Days					Facility Evaluation Rating					BI		QA		Reserved														
67			1	69	70	2	71	N	72	N	73			74	75										80			

### Section B: Facility Data

Name and Location of Facility Inspected ( <i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i> ) From Santa Fe, North on 84/285. Continue onto Riverside drive (Espanola), turn east onto NM 76, take Cordova exit. Take a left onto County Road 80. Manhole located as you turn onto County Road 80.	Entry Time /Date 0950 Hours / February 20, 2018	Permit Effective Date N/A
	Exit Time/Date 1130 Hours / February 20, 2018	Permit Expiration Date N/A
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Joseph Romero, President, Cordova MDWCA Ramon Lucero, Souder Miller (Contractor) / (505) 660-2186	Other Facility Data SIC: 4952 LONG: -105,76247° LAT: 36.00614°	
Name, Address of Responsible Official/Title/Phone and Fax Number Joseph Romero, President Cordova MDWCA Post Office Box 40 Cordova, NM 87323	Yes <input type="checkbox"/> * <input type="checkbox"/> No <input type="checkbox"/>	

### Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

U	Permit	N	Flow Measurement	N	Operations & Maintenance	U	CSO/SSO
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

### Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Please see the attached inspection report.

Name(s) and Signature(s) of Inspector(s) Sandra Gabaldon	Agency/Office/Telephone/Fax NMED/SWQB/(505) 827-1041/(505) 827-0160	Date
Signature of Management QA Reviewer Sarah Holcomb, Program Manager	Agency/Office/Phone and Fax Numbers NMED/SWQB/(505) 827-2798/(505) 827-0160	Date

**Cordova MDWCA**  
**NPDES Tracking No. NMU001962**  
**Reconnaissance Inspection (RI)**  
**February 20, 2018**

**INTRODUCTION**

On February 20, 2018, a Reconnaissance Inspection (RI) was conducted at the Cordova MDWCA (Mutual Domestic Water Consumers Association) lift station, located on County Road 80, Rio Arriba County, New Mexico, by Sandra Gabaldon and Daniel Valenta, both of the Point Source Regulation Section, Surface Water Quality Bureau (SWQB); and Mr. Steve Pullen and Russell Isaac of the Ground Water Quality Bureau (GWQB) of the State of New Mexico Environment Department (NMED). This inspection followed a written complaint received on the Environmental Notification Tracking System (ENTS). The complaint stated that the wastewater treatment plant had a manhole with surfacing sewage.

The Cordova MDWCA has a discharge permit (DP-1548) issued by the New Mexico Ground Water Quality Bureau, for their underground wastewater system (similar to septic tanks). They are not permitted to discharge to surface water. For tracking purposes, this site was issued NPDES (National Pollutant Discharge Elimination System) number NMU001962.

Prior to this visit, the GWQB did a site investigation on January 8, 2018. This visit was generated by an anonymous complaint received by GWQB. The site investigation report is attached to this document. This sanitary sewer overflow has been an ongoing issue for the MDWCA since April 2017.

**INSPECTION OVERVIEW**

On the day of the inspection, NMED met with Mr. Joseph Romero, President, Cordova MDWCA; and Mr. Ramon Lucero, Souder Miller & Associates (Contractor). Mr. Romero stated that the MDWCA contracts with a New Mexico Certified Operator, Level 4, Mr. Eugene Bassett. Mr. Bassett was not in attendance for this inspection.

NMED arrived at the site at approximately 0950 hours on February 20, 2018. Discussions continued regarding the SSO with representatives from GWQB, Souder Miller and Associates and the MDWCA. SWQB stated the federal requirements under the NPDES Permitting Program. Ms. Gabaldon provided an overview of the requirements and the issues surrounding the SSO entering the Rio Quemado. New Mexico Water Quality Standards, *NMAC 20.6.4* show the Rio Quemado in segment *NMAC 20.6.4.123* (Rio Arriba county bound to headwaters) is assigned assessment unit *NM-2120.1\_120*. The designated uses of this segment include: domestic water supply, high quality coldwater aquatic life, irrigation, livestock watering, wildlife habitat and primary contact.

On this date, there was still snow on the ground, which was melting. However, you could smell the sewage and see the staining on the pavement where it had been trailing down to the Rio Quemado.

The representatives stated that they had no money to fix the leak and were awaiting to hear about any funding possibilities to help them fix the issue. After discussion about the possibility of enforcement from USEPA, the MDWCA fixed the raw sewage leak that same afternoon. They provided photos of the line where they replaced a 2" PVC elbow. This corrected the problem and there is no longer raw sewage entering the Rio Quemado.

The MDWCA has approximately 20 residents that use their wastewater system currently. Because there have been so many issues with the operation and maintenance of this small facility, the Treasurer, Ms. Myrna Romero, recently submitted her resignation letter. The board is made up of voluntary positions. Ms. Romero stated that she could no longer deal with the stresses of the position.

The MDWCA is encouraged to find funding opportunities for their community. There are many opportunities to the community from EPA, the State of New Mexico as well as the United States Department of Agriculture.

The MDWCA should learn about and funding resources that may be available to them to avoid any further problems with their system.

**NMED/ SWQB**  
**Official Photograph Log**  
Photo # 1

Photographer:	Date: February 20, 2018	Time: 10:00 AM
City/County: Cordova/Rio Arriba County		
Location: Cordova MDWCA (County Road 80)		
Subject: Manhole; raw sewage surfacing.		





**NMED/SWQB**  
**Official Photograph Log**  
Photo #2

Photographer:	Date: February 20, 2018	Time: 10:00 AM
City/County: Cordova / Rio Arriba County		
Location: Cordova MDWCA		
Subject: Raw sewage trail leading to Rio Quemado		





**NMED/SWQB**  
**Official Photograph Log**  
Photo #3

Photographer:	Date: February 20, 2018	Time: 10:02 AM
City/County: Cordova / Rio Arriba County		
Location: Cordova MDWCA		
Subject: Raw sewage commingled with melting snow.		





**NMED/SWQB**  
**Official Photograph Log**  
Photo #4

Photographer:	Date: February 20, 2018	Time: 10:02 AM
City/County: Cordova / Rio Arriba County		
Location: Cordova MDWCA		
Subject: Raw sewage commingled with melting snow.		





**NMED/SWQB**  
**Official Photograph Log**  
Photo #5

Photographer:	Date: February 20, 2018	Time: 10:04 AM
City/County: Cordova / Rio Arriba County		
Location: Cordova MDWCA		
Subject: Rio Quemado		





**NMED/SWQB**  
**Official Photograph Log**  
Photo #5

Photographer: Ramon Lucero, Souder Miller & Associates	Date: February 20, 2018	Time: 1555 Hours
City/County: Cordova / Rio Arriba County		
Location: Cordova MDWCA		
Subject: 2" line fixed with replacement elbow.		



Attachment #1  
New Mexico Environment Department  
Ground Water Quality Bureau  
Inspection Report  
Dated: January 8, 2018





Inspection Date: January 8, 2018 DP #: 1548  
Facility Name: Cordova Mutual Domestic Water  
Consumers Association (MDWCA)

**Facility Contact Information – Scheduling Inspection**

☒ Scheduled Inspection - provide contact information ☐ Unannounced Inspection

Person Contacted: Myrna Romero, Secretary Treasurer, Eugene Bassett Contract Operator  
Phone Number: 505-351-2149

**Facility Description**

Waste Type: Dom - WW

Directions to Facility: Travel northeast on State Road 76, east of Espanola. Turn right on County Road 80 to Cordova. Turn right on street when CR 80 makes a left and goes uphill.

**Inspection Information**

Start Time: 11:20 End Time: 12:30

NMED Inspector(s): Russell A. Isaac, Andrew Romero

Verify that NMED identification was presented: ☒ Yes ☐ No

Facility Representative(s) present during the Inspection/Discussion: Joseph Martinez, Board Member

Reason for Inspection: spill investigation

**Discussion, Observations and Information Obtained**

NMED received an anonymous complaint of continuing surfacing sewage in Cordova at CR83 #191.

NMED staff met with the Association Board Member. Leaking from the area of the furthest uphill manhole cover continues. While there was no odor (temperature about 45° F), it appeared to be wastewater. We arrived at appeared to be the end of a pumping cycle, so the amount of flow was minimal (~ 1 gpm) some of which seemed to be coming up through the pavement. It is possible that most of the discharge occurs during pumping but that the leaking continues after the pump is off by wastewater in the force main flowing back from the higher elevation and exiting at some crack in the force main near the manhole. The flow freezes on the roadway and creates a road hazard. It also flows downhill and, when observed at the time of the inspection, a small amount reaches the stream at the base of the hill.

Mr. Martinez said the Board was aware that this was a continuing problem but what little resources were available were directed towards issues with the water supply. Mr. Martinez also noted that if the exact nature of the presumed break and its location could be identified, some efforts by personnel and equipment available



to the Association could at least contribute to remediating the problem. As built plans would be helpful if they can be found.

It is most likely that the only way the problem will be attended to is through an enforcement action which would be as much an aid to help in securing some funds. The first requirement is to diagnose the problem through inspecting the area of the leak and this might be done by video camera in the force main.

## Photographic Documentation

Photos Taken? ☒ Yes - see attached ☐ No

## Sample Information

Samples Collected? ☐ Yes ☒ No

## Monitoring Well Camera Inspection

Monitoring well camera inspection conducted? ☐ Yes - see attached report(s)  
☒ No

Initials of Report Preparer: RAI

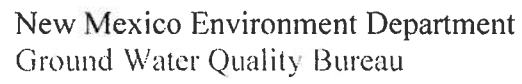
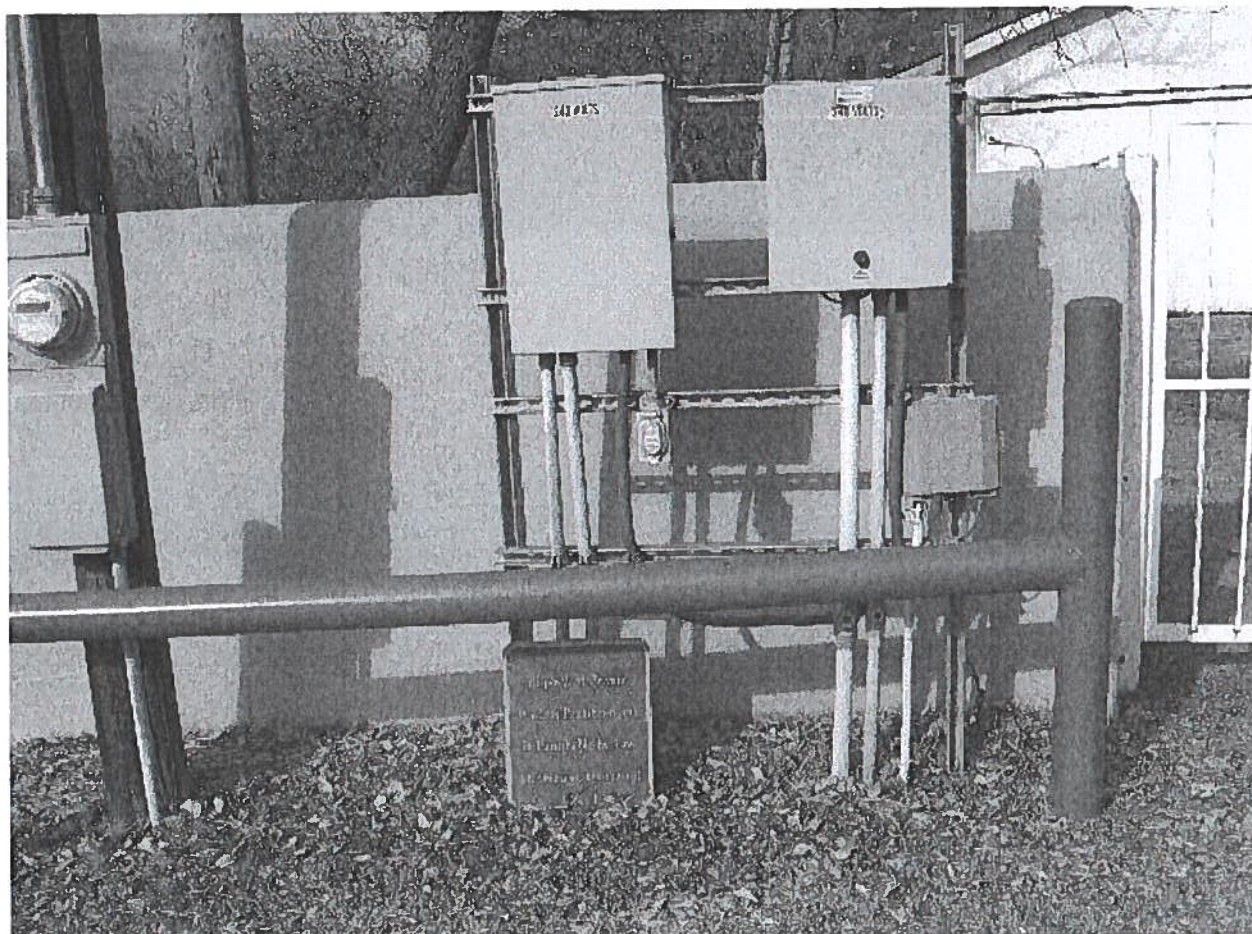
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Figure 1: LOCATION OF DP-1548 CORDOVA DOMESTIC WATER USERS ASSOCIATION



*Figure 2: POER FOR THE LIFT STATION.*





*Figure 3: LEAKING AREA AND POWER INSTALLATION.*



*Figure 4: LEAKING AREA AND ICY AREA AS A RESULT.*



*Figure 5: LEAKAGE FROM FURTHEST UP HILL MANHOLE.*



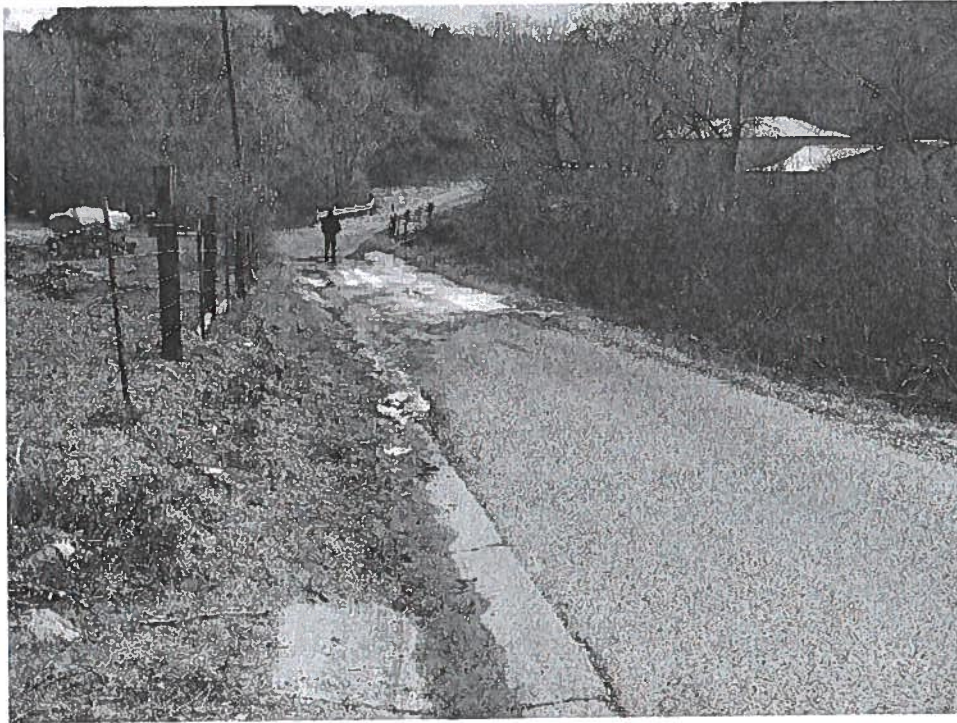


*Figure 6: LEAKAGE FLOWING DOWNHILL TOWARDS THE STREAM.*



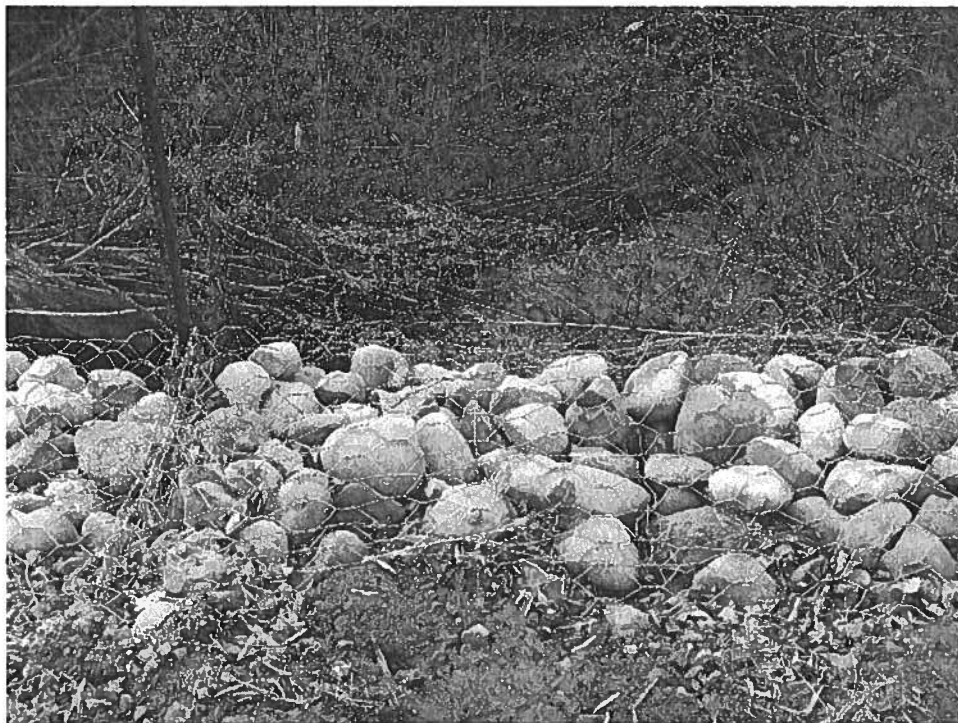


*Figure 7: FULLER VIEW OF DRAINAGE FROM LEAK.*

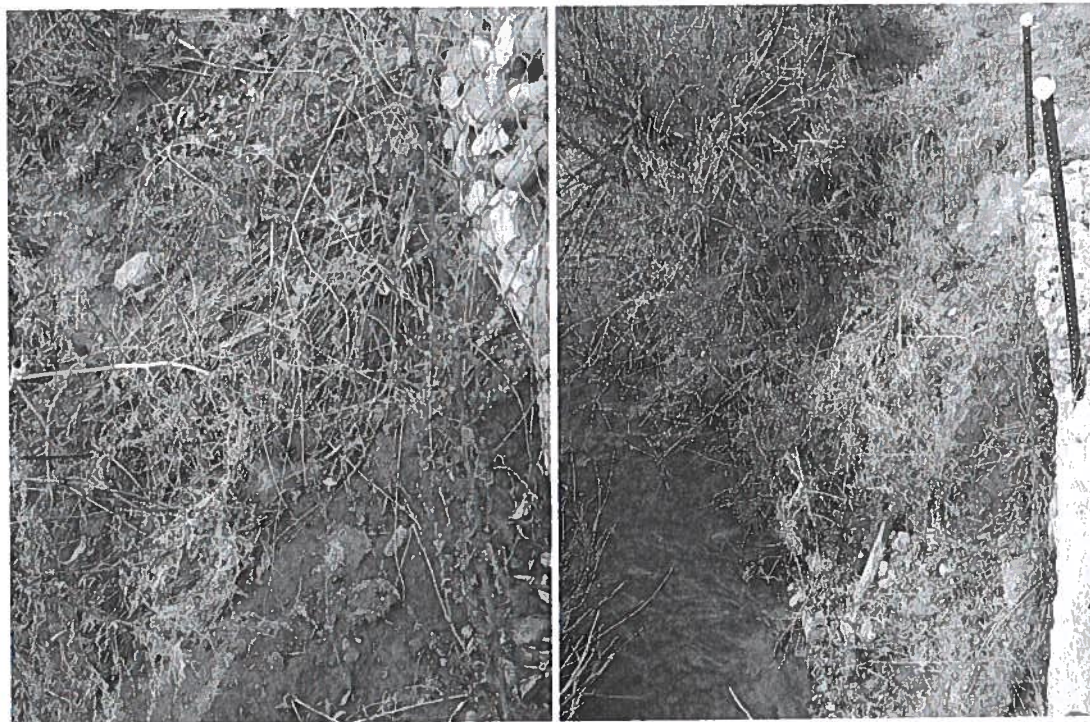


*Figure 8: ICE FROM LEAKAGE AND FLOW OVER ROADWAY TO STREAM.*





*Figure 9: FLOW JUST BEFORE GOING OVER THE EDGE TO THE STREAM.*



*Figure 10: FLOW GOING OVER THE EDGE OF THE ROADWAY WITH SOME REACHING THE STREAM.*





*Figure 11: MOSIT AREA UP HILL FROM LEAKING AREA; NOT CLEAR IF THIS ANYTHING TO DO WITH THE WASTEWATER SYSTEM.*